

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

FANNIE MAE	:	CASE NO. 1:24-cv-1606
	:	
	:	Judge Bridget Meehan Brennan
Plaintiff,	:	
	:	
v.	:	
	:	
HATZ ONE LLC, et al.	:	
	:	
Defendants.	:	

**DEFENDANTS HATZ ONE LLC, HATZ TWO LLC, CLEVELAND 2 LLC,
CLEVELAND 3 LLC, AND MENDEL STEINER’S MOTION FOR LEAVE TO FILE
REPLY TO PLAINTIFF’S SUPPLEMENTAL BRIEF**

Defendants Hatz One LLC, Hatz Two LLC, Cleveland 2 LLC, Cleveland 3 LLC (collectively, “Borrowers”), and Mendel Steiner (“Guarantor”) (all collectively “Hatz”), hereby move the Court, pursuant to its broad discretion to manage its own docket, for leave to file a Reply to Plaintiff’s Supplemental Brief in Support of its Motion to Appoint a Receiver filed on December 6, 2024 (“Supplemental Brief”). Plaintiff makes several new allegations and attaches a “Property Condition Assessment” prepared by Armada Analytics which does not provide a full accurate or up-to-date picture of ongoing renovations and repairs. Hatz seeks the opportunity to respond to these new allegations to more fully and accurately develop and update the record and ensure the Court is aware of all pertinent facts and has the most accurate and current pertinent facts in considering Plaintiff’s *Ex Parte* Motion to Appoint a Receiver.

Thus, recognizing this Court’s broad inherent power to grant supplemental briefing and in the interest of fairness, Hatz should be afforded the opportunity to respond to the new evidence and allegations presented by Plaintiff. Therefore, Hatz respectfully requests that it be granted up to and including December 20, 2024 within which to file a Reply to Plaintiff’s Supplemental Brief.

Respectfully submitted,

UB GREENSFELDER LLP

/s/ Amanda J. Martinsek

Amanda J. Martinsek (0058567)

1660 West 2nd Street

Suite 1100

Cleveland, OH 44113

Telephone: (216) 583-7000

Fax: (216) 583-7001

amartinsek@ubglaw.com

OFFIT KURMAN, P.A.

/s/ Joyce A. Kuhns

1954 Greenspring Drive, Suite 605

Timonium, MD 21093

(410) 209-6400 (phone)

(410) 209-6435 (facsimile)

jkuhns@offitkurman.com

**ATTORNEYS FOR DEFENDANTS HATZ
ONE LLC, HATZ TWO LLC, CLEVELAND 2
LLC, CLEVELAND 3 LLC, AND MENDEL
STEINER**

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2024, a true and accurate copy of the foregoing was filed with the Clerk of the Court and served on counsel of record using the CM/ECF system.

/s/ Amanda J. Martinsek

Amanda J. Martinsek (0058567)

Attorney for Defendants Hatz One LLC, Hatz Two LLC, Cleveland 2 LLC, Cleveland 3 LLC, and Mendel Steiner